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U.S. Department of Justice

United States Attorney Southern District of New York

United States Attorney's Office 50 Main Street, Suite 1100 White Plains, New York 10606

May 15, 2024

## BY ECF AND EMAIL

The Honorable Kenneth M. Karas United States District Judge 300 Quarropas Street White Plains, New York 10601

Re: United States v. Hong Ru Lin and Kena Zhao, 23 Cr. 469 (KMK)

Dear Judge Karas:

The Government writes respectfully in response to defendant Hong Ru Lin's request for permission to travel to Poland and Ukraine between June 1 and June 30, 2024. Lin has provided the Government with documentation that supports his claim that, before he was aware of the Government's investigation in this case, Lin and his co-defendant Kena Zhao contracted to become the biological parents a young child who would be born to a surrogate in Ukraine. That child was born in November 2023, and the Government accepts Lin's representation that he now needs to travel to Ukraine in person to formally adopt the child and bring her back to the United States. In light of, among other considerations, those documents, Lin's secured bond, the defendants' agreement that Zhao will remain in the United States while Lin is traveling, Lin's preexisting ties to the United States, and Lin's agreement that his bail conditions should also be modified to require that he contact his Pretrial Services officer by phone upon arrival in Poland, arrival in Ukraine, and once per week thereafter, the Government does not oppose this request.

In light of the lack of opposition from the Government and Pre-Trial Services, the request for Lin to travel to Poland and Ukraine, on the conditions noted herein, is granted.

cc:

By:

Ryan W. Allison Jamie E. Bagliebter Margaret Vasu

Respectfully submitted,

DAMIAN WILLIAMS

United States Attorney for the

Southern District of New York

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